

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DOUGLAS GILSTRAP and MYRON TATARYN, each
on behalf of himself and all others similarly situated,

Plaintiffs,

vs.

RADIANZ LTD., RADIANZ AMERICAS, INC.,
REUTERS LIMITED, BLAXMILL (SIX) LIMITED,
REUTERS C LLC, REUTERS AMERICA LLC,
and BRITISH TELECOMMUNICATIONS plc,

Defendants.

05-CV-7947 (PKC)

DOUGLAS GILSTRAP, BRIAN DILLON and
JOHN MADIGAN,

Plaintiffs,

vs.

RADIANZ LTD. and RADIANZ AMERICAS, INC.,

Defendants.

06-CV-14218 (PKC)

**SUPPLEMENTAL AFFIDAVIT OF RICHARD A. ROTHMAN IN FURTHER
SUPPORT OF DEFENDANTS' MOTION FOR INJUNCTIVE RELIEF AND COSTS**

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

RICHARD A. ROTHMAN, being duly sworn, deposes and says:

1. I am an attorney admitted to practice before this Court and a partner of
Weil, Gotshal & Manges LLP, attorneys for Defendants Radianz Ltd., Radianz Americas, Inc.,

Reuters Limited, Blaxmill (Six) Limited, Reuters C LLC, Reuters America LLC and British Telecommunications plc (collectively, "Defendants").

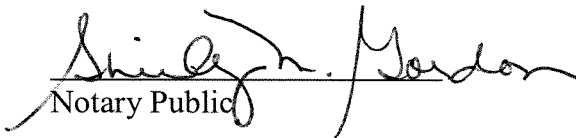
2. I submit this supplemental affidavit in further support of Defendants' motion, brought on by Order to show cause, for injunctive relief and costs (the "Motion").

3. Annexed hereto as Exhibit A is a true and correct copy of a letter from Richard A. Rothman to Stephen D. Susman, dated August 3, 2007 (submitted in redacted form), which is cited in Defendants' accompanying reply memorandum of law in further support of the Motion.



Richard A. Rothman

Sworn to before me on this
5th day of October, 2007


Notary Public

SHIRLEY M. GORDON
Notary Public, State of New York
No. 01GO4925690
Qualified in Bronx County
Certificate Filed in New York County
Commission Expires April 4, 2012

EXHIBIT A

WEIL, GOTSHAL & MANGES LLP

767 FIFTH AVENUE
NEW YORK, NY 10153
(212) 310-8000
FAX: (212) 310-8007

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WARSAW
WASHINGTON, D.C.

RICHARD A. ROTHMAN
DIRECT LINE (212) 310-8426
E-MAIL: richard.rothman@weil.com

August 3, 2007

CONFIDENTIAL SETTLEMENT COMMUNICATION

Stephen D. Susman, Esq.
Susman Godfrey LLP
1000 Louisiana Street, Suite 5100
Houston, Texas 77002-5096

Re: **Gilstrap, et al. v. Radianz Limited, et al.**

Dear Steve:

REDACTED

If the offer is not accepted, our clients will proceed to defend themselves vigorously in the courts, including, as we have discussed in the past, by seeking dismissal and sanctions with respect to any further complaint filed in the United States —whether in New York or Texas.

REDACTED

WEIL, GOTSHAL & MANGES LLP

Stephen D. Susman, Esq.
August 3, 2007
Page 2

REDACTED

Best regards,

A handwritten signature in black ink, appearing to read 'Richard A. Rothman', written in a cursive style.

Richard A. Rothman

cc: Stuart V. Kusin, Esq.
Jonathan D. Polkes, Esq.